

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

MICHAEL BAINBRIDGE, on behalf of	)	CASE NO.: 5:16-cv-00555
himself and all others similarly situated,	)	
	)	JUDGE BENITA Y. PEARSON
Plaintiff,	)	
	)	<b><u>DECLARATION OF CLASS</u></b>
vs.	)	<b><u>COUNSEL ANTHONY J. LAZZARO</u></b>
	)	<b><u>IN SUPPORT OF FINAL</u></b>
MEDLINE INDUSTRIES, INC.	)	<b><u>APPROVAL OF CLASS ACTION</u></b>
	)	<b><u>SETTLEMENT</u></b>
Defendant.	)	
	)	

I, Anthony J. Lazzaro, pursuant to 28 U.S.C. § 1746, hereby declare, under penalty of perjury, that the following is true and correct to the best of my personal knowledge, information, and belief:

1. I, Chastity L. Christy and Lori M. Griffin are Class Counsel for Plaintiff Michael Bainbridge and the Class Members.
2. Class Counsel Chastity L. Christy and Lori M. Griffin are Associate attorneys with The Lazzaro Law Firm, LLC.
3. Class Counsel effectuated the class notice process as prescribed by the Parties' Settlement Agreement and the Court's November 28, 2016 Order preliminarily approving settlement.
4. Class Counsel were responsible for: (a) preparing and mailing the Class Notice; (b) processing undeliverable mail and locating updated addresses for the Class Members; (c) receiving communications about the settlement; and (d) tracking the number of Class Members, receiving and tracking the number of requests for exclusion from the settlement, and receiving any objections to the settlement.

5. On November 30, 2016, in accord with the Preliminary Approval Order, Defense counsel provided Class Counsel with the last known addresses of the Class Members. The list contained 3566 Class Members.

6. On December 1, 2016, Class Counsel updated the addresses using the National Change of Address Database, which updates addresses for all people who had moved during the previous four years and filed a change of address with the U.S. Postal Service. New addresses were found for 130 Class Members, and the Class Member list was updated with these new addresses.

7. On December 12, 2016, Class Counsel mailed the Class Notice to the 3566 Class Members via First-Class Mail in the form approved by the Court.

8. As of this date, Class Counsel has received 172 returned notices. Seven (7) of the returned notices contained forwarding addresses, and notices were re-mailed to these Class Members. Ultimately, 165 notices out of 3566 had bad addresses and were undeliverable.

9. As of this date, Class Counsel has received zero (0) objections to the settlement.

10. As of this date, Class Counsel has received 14 requests to be excluded from the settlement.

11. The final tally of litigation expenses incurred and paid by Class Counsel is \$8,048.30.

Anthony J. Lazzaro  
Anthony J. Lazzaro (Jan 26, 2017)

Anthony J. Lazzaro (0077962)  
The Lazzaro Law Firm, LLC  
920 Rockefeller Building  
614 W. Superior Avenue  
Cleveland, Ohio 44113  
Phone: 216-696-5000  
Facsimile: 216-696-7005  
anthony@lazzarolawfirm.com  
Class Counsel

Dated: Jan 26, 2017